

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION**

**SANDRA C. TORRES, INDIVIDUALLY §
AND AS MOTHER AND §
REPRESENTATIVE OF THE ESTATE §
OF DECEDED, E.T., AND AS NEXT §
FRIEND OF E.S.T., MINOR CHILD; ELI §
TORRES, JR.; and JUSTICE TORRES, §** CIVIL ACTION NO. 2:22-CV-00059-

Plaintiffs,

V.

Defendants.

Plaintiffs' Notice of Withdrawal of Motion to Voluntarily Dismiss Under Federal Rule of Civil Procedure 41(a)(2) Without Prejudice

Plaintiffs hereby withdraw their currently pending motion pursuant to Rule 41(a)(2), which was filed on February 23, 2023. The motion was premised on the pendency in the Austin Division of multiple related lawsuits arising out of the Uvalde school shooting and raising similar claims against similar defendants, and the judicial efficiency and economy from having all the related lawsuits heard together. Yesterday, those lawsuits were transferred from the Austin Division to the Del Rio Division (those orders are attached hereto as Exhibit A). Accordingly, the basis for Plaintiffs' Rule 41(a)(2) motion is no longer applicable, and judicial efficiency and economy will be served by keeping this lawsuit here in the Del Rio Division along with the other cases. Plaintiffs therefore respectfully that their Rule 41(a)(2) motion be deemed withdrawn.

DATED: March 2, 2023

Respectfully Submitted,

/s/ *Molly Thomas-Jensen*

EVERYTOWN LAW

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of March, 2023, I served the following counsel through electronic service (ECF) as authorized by Fed. R. Civ. Pro. 5:

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Counsel for Defendant, Daniel Defense, LLC (fka Daniel Defense, Inc.)

I hereby certify that on the following defendants in this action will be served in accordance with Fed. R. Civ. Pro. 5(b) either personally, by mail, or electronic mail:

Oasis Outback, LLC;
City Of Uvalde;
Uvalde Consolidated Independent School District;
Uvalde County;
Uvalde Consolidated Independent School District Police Department (“UCISD-PD”);
Chief Pedro ‘Pete’ Arredondo;
Uvalde Police Department (“UPD”);
Lieutenant and Acting Chief Mariano Pargas;
Former UPD Officer and UCISD School Board Member Jesus “J.J.” Suarez;
UPD Sergeant Daniel Coronado;
UPD Officer Justin Mendoza;
UPD Officer Max Dorflinger;
Uvalde County Sheriff Ruben Nolasco;
Uvalde County Constable Emmanuel Zamora;
Uvalde County Constable Johnny Field;
Texas Department Of Public Safety (“TDPS”) Captain Joel Betancourt;
TDPS Sergeant Juan Maldonado;
TDPS Ranger Christopher Kindell

/s/ Molly Thomas-Jensen
Molly Thomas-Jensen